

**CHARGE OF DISCRIMINATION  
DWIGHT LEWIS  
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**I. Overview of Individual and Class Allegations**

AK Steel Corporation has discriminated and continues to discriminate against me in the terms and conditions of my application for employment with them on the basis of my race, African-American, by denying me the opportunity to be hired while hiring equally or less qualified white employees and subjecting me to a racially hostile application process and other forms of discrimination. I believe that AK Steel Corporation's actions are part of a continuing pattern and practice of discrimination against African-American applicants for employment and employees, including but not limited to, denying applicants hiring opportunities while providing such opportunities to equally or less qualified white applicants and subjecting them to a racially hostile application process.

**II. Statement of Personal Harm**

I applied to AK Steel on approximately May 9, 2002 for a general labor position at their plant in Ashland, Kentucky. As I was going into church one morning, an AK Steel representative handed me an announcement that AK Steel would be participating in a job fair at the town center. Because I have two years of experience working as a general laborer at a steel foundry, Dayton Walter, assembling brake irons and monitoring the molds that liquid iron is poured into on an assembly line, among other things, as well as five years of experience doing janitorial work in hospitals and three years of experience as a prison security guard, I decided to attend. In addition, I have a high school diploma and have completed three years of college, one at Ohio University and two at Shawnee State. At the fair, a white recruiter named Susan Lester took my name and scheduled me to take the AK Steel qualifying exam two weeks later. The exam had two parts. The first part inquired into my general knowledge of topics including basic physics, math, reading comprehension, and pattern recognition. I found it to be relatively easy. The second part was a personality test, which posed questions like "Would you like to learn about different cultures? Do you like working with different kinds of people? If someone said something mean to you would you respond by attacking them or just let it go?" Having taken tests of this nature previously, I responded as I believed that an ideal employee would. I indicated, among other things, my desire to learn about other cultures and that I would never think bad thoughts about my fellow employees or get angry at them. Approximately one week later Ms. Lester contacted me to inform me that I hadn't passed the test but that I could take it again in one year. I tried to ask Ms. Lester if I had failed the general exam or the personality test, but she cut off my questions, thanked me for my interest in AK Steel, and hung up. I have not had contact with AK Steel subsequently. I have been stripping wax floors and doing basic janitorial work for Helping Hand, a cleaning service, for approximately five months.

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**III. Statement of Discrimination**

I believe that AK Steel Corporation has discriminated against me and continues to discriminate against me in the terms and conditions of my applications for employment with them on the basis of my race, African-American, in violation of the Civil Rights Act of 1964, as amended, because white applicants with fewer qualifications than me have been hired and I have not, and because I have been subjected to a racially hostile application process and other forms of discrimination and denied the right to apply for work in an environment free of racial discrimination.

I have been adversely affected by these discriminatory practices by being deprived of the equal opportunity to be hired. Such discrimination denies me and other African-Americans the right to be hired for positions for which we are qualified.

This systemic discrimination also adversely affects the status of African-Americans as employees by promoting and reinforcing racial stereotypes and bias in hiring.

**IV. Statement of Classwide Discrimination on the Basis of Race**

Based on my experiences, I believe that AK Steel Corporation has engaged and continues to engage in a pattern and practice of discrimination against its African-American applicants for employment and employees that denies them equal employment opportunities in ways including but not limited to the following: denying them hiring opportunities while providing such opportunities to equally or less qualified white employees and subjecting them to a racially hostile application process and work environment in which few other African-Americans are employed. This policy violates Title VII of the 1964 Civil Rights Act, 42 U.S.C. Section 2000(e), et seq.

I believe this policy has effected a class of black persons comprised of all past, present and future black applicants for employment with AK Steel. I believe that these discriminatory practices occur throughout AK Steel Corporation. I make this charge on behalf of myself and all similarly situated African-American applicants for employment and employees.

I declare under penalty of perjury that the foregoing is true and correct.

Date: x 6/17/02

x Douglas E. Zis

Charging Party (signature)